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7 In Pro Per

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9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES

11 PLAINTIFF

12 Case No: 2:23-cv-03452-JAK-MRWx

13 TODD MICHAEL SCHULTZ

14 vs.

15 DEFENDANTS

16 MICHAEL C. THOMPSON  
17 GREGORY R. HOLMES  
18 YOUTUBE LLC

MOTION FOR SANCTIONS ON  
DEFENDANTS MICHAEL C.  
THOMPSON GREGORY R. HOLMES  
AND YOUTUBE FOR MISPRISON,  
WITNESS AND PLAINTIFF  
INTIMIDATION

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20 Jury Trial Demanded: YES

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22 PLAINTIFF TODD MICHAEL SCHULTZ, in Pro Per, requests that sanctions be  
23 placed on both Defendants Michael C. Thompson and Defendant Gregory R. Holmes.  
24 The behavior described in the FOURTH AMENDED COMPLAINT (4AC) has  
25 continued and highly likely, due to improper intimidation on YouTube's Live Chat,  
26 Twitter (currently called "X") and emails from the long time stalker of Plaintiff's  
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boyfriend. A woman, Soledad Haren has commented often on HL Channel (4AC) and has participated in Thompson's Livechat's, to the best of my knowledge. Many very toxic and otherwise harassing emails have come from Ms. Haren. Plaintiff alleges that Mr. Thompson likely played a role in a major amount of all of this conduct. Conduct has included using aliases like "Bret Has HIV" in the LiveChat. Let it be known that relief at the end of this trial must indicate some redress for the functionality that allows for this type of impulsive and anonymous illegal behavior on Youtube, admittedly, the largest platform for User Generated Content. YouTube, let it be put in the record, does not market itself as an "anything goes" type of company. Mr. Thompson knows he is breaking their terms of service. He is responsible for that behavior. YouTube may be responsible as well. Provided that they have provided no voluntary redress for the issue of a functional live chat, they continue to operate with no redress to an issue that I, a victim, stated. Were I not suing YouTube in federal court alongside Holmes and Thompson, they would simply be waiting on the outcome of the trial to decide whether or not Thompson and Holmes' extensive set of illegal activity continues to take place. And they would have to be aware insofar as they were emailed the FIRST AMENDED COMPLAINT upon request. A lack of investigation and firm reason based decision is highly damning, and Plaintiff requests that where appropriate, all defendants be Sanctioned as the court sees fit. Granted, Plaintiff chooses to continue using YouTube, Plaintiff does not harass or participate in illegal or harmful behavior when doing so and

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1 so invokes, if it were at all necessary, his first amendment rights and YouTube's explicit  
2 notice to remove if they take issue with me using their platform. It's the only platform I  
3 have where I can reasonably reach people and play music for them. Plaintiff requests an  
4 injunctive protective order from Michael Thompson and Gregory Holmes, extending to  
5 any conspiracy, meaning that they will testify to aforementioned alleged activities they  
6 are aware of having taken place since May 5<sup>th</sup> of 2023. Allegations requiring sanctions:  
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- 9     1) Mr. Thompson and Mr. Holmes knew of attempts to harass Plaintiff and  
10         supported, participated or executed them as of May 5 2023.
- 12     2) Mr. Thompson and Mr. Holmes know of attempts to intimidate Plaintiff via  
13         Twitter using handles such as "Judge Dooty" featuring mocking and  
14         dangerously close to defamation and otherwise significantly corrupt, especially  
15         in the context of being a party to said lawsuit for similar conduct.
- 17     3) YouTube LiveChats from users such as "GREG CHAR" and usernames related  
18         to Plaintiff's Pro Se status were used to intimidate Plaintiff and prevent him  
20         from executing his duties as a Pro Se Litigant.
- 22     4) Mr. Thompson must answer whether he has ever written or helped to write any  
23         of the offensive emails Ms. Haren has sent.

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26 Plaintiff contends that not all speech he finds offensive is harassment. However, in the  
27 context of the matter at hand, such conduct is necessary to be lodged with the court as  
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1 precisely as possible so that due process for Plaintiff can occur and assure that  
2 Defendants themselves are not engaged in activities to disrupt that process, which would  
3 be the basis for requested sanctions.  
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5 Further, Defendant Youtube should be required to admit or deny that Mr.  
6 Thompson's HL Channel, which has since been copyright stricken by myself, after  
7 obtaining an 875 dollar copyright of the videos Thompson posted (meaning Plaintiff  
8 owned the copyright prior to registration, too, or copyright would not have been granted).  
9 They should be sanctioned if after brief questioning, they determine that the channel was  
10 in violation of their guidelines and applicable law, then they are proven to have  
11 committed misprision throughout this case.  
12

13 Plaintiff is new to the court system, but comfortable asserting the truth as he sees  
14 fit. Plaintiff is always amenable to court instruction provided any mistakes are during use  
15 of the court system at his discretion. Rules are rules, and Plaintiff seeks to follow such  
16 rules.

17 If the court requires that I request specific relief, I will provide for such a request.  
18 Plaintiff requests acknowledgement of any of the aforementioned conduct or the  
19 misprision of any such conduct, provided the court agrees knowledge of such behavior  
20 (intended to prevent Plaintiff's due process) indeed sufficiently violates Federal Code and  
21 Rule of Law. Plaintiff provides that it is merely possible Thompson and Holmes are not  
22 involved with these activities but very PROBABLE given his knowledge of their  
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1 previous conduct. Therefore, Plaintiff finds it fair to lodge and request sanctions if it is  
2 found that they are in violation. Plaintiff will lodge the exhibits at the will of the court  
3 and stipulation of all parties on naming, but for the sake of this motion, leaves it to the  
4 opposing sides to deny all allegations in sufficient detail. Plaintiff has not engaged in this  
5 type of activity and can clearly state “No” if asked similar, but reversed claims.  
6

7 Plaintiff urges the court to determine whether or not the defendants are involved in  
8 an intimidation campaign and to sanction them wherever deemed necessary as the  
9 harassment is not just hurtful, but harmful to the public discourse and in turn, stimulating  
10 intellectual discourse on the internet, which is in the spirit of the internet as regarded in  
11 Section 230 A(3) for example.  
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16 Dated Wednesday August 2<sup>nd</sup>, 2023  
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18 SIGNATURE of Plaintiff acting in Pro Per  
19 Todd Michael Schultz  
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